

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
No. 3:22-cv-191

KANAUTICA ZAYRE-BROWN,

Plaintiff,

v.

NORTH CAROLINA DEPARTMENT OF  
ADULT CORRECTION, et al.,

Defendants.

**APPENDIX TO DEFENDANTS'  
RESPONSE TO PLAINTIFF'S MOTION  
FOR PARTIAL SUMMARY JUDGMENT**

**(Hearing Requested)**

NOW COME Defendants to respectfully submit this Appendix with Exhibits to their Response to Plaintiff's Motion for Partial Summary Judgment.

<b>Exhibit</b>	<b>Description</b>
1	Expert Report of Sara E. Boyd, Ph.D., dated July 5, 2023
2	Medical Records (DAC 738-739, 741-742, 747-749, 753-755, 875)
3	Medical Records (DAC 724-725, 730-731, 734-736)
4	May 2021 Emails (DAC 4127-4130, 4447)
5	Excerpts of the deposition of Brian Sheitman, M.D., taken on May 17, 2023: Pages 27-29, 35, 44, 49-50, 56-65, 70-72, 84, 94-97, 109-111, 113-121, 131-132, 143-144
6	Excerpts of deposition transcript, Terri Catlett, taken on May 18, 2023: Pages 44-46, 61-64, 73-76
7	Excerpts of the deposition of Arthur Campbell, M.D., taken on April 18, 2023: Pages 79-82
8	Medical Records (DAC 2692-2696; PLAINTIFF0004)
9	Excerpts of the deposition of Gary Junker, PhD, taken on May 4, 2023: Pages 224-228
10	Excerpts of deposition transcript, Joseph V. Penn, M.D., taken on August 8, 2023: Pages 55-56, 71-72, 84-87
11	Excerpts of the deposition of Lewis Peiper, Ph.D., taken on May 1, 2023: Pages 89-92
12	Excerpts of deposition transcript, Sara E. Boyd, Ph.D., taken on August 4, 2023: Pages 80-120, 156-170
13	Expert Report of Joseph V. Penn, M.D. dated July 5, 2023

14	Excerpts of the deposition of Marvela Bowman, Ph.D., taken on June 29, 2023: Page 119
15	Expert Report of Fan Li, Ph.D., dated June 17, 2023:
16	Excerpts of deposition transcript, Fan Li, Ph.D., taken on August 11, 2023: Pages 24-45, 51-70, 100-147, 150-160
17	Excerpts of 30(b)(6) deposition of Arthur Campbell, M.D., on behalf of the North Carolina Department of Adult Correction, taken on April 18, 2023: Pages 16-35, 69-72

This the 19th day of October 2023.

**JOSHUA H. STEIN**  
**Attorney General**

/s/ Orlando L. Rodriguez  
Orlando L. Rodriguez  
Special Deputy Attorney General  
[orodriguez@ncdoj.gov](mailto:orodriguez@ncdoj.gov)

Stephanie A. Brennan  
Special Deputy Attorney General  
[sbrennan@ncdoj.gov](mailto:sbrennan@ncdoj.gov)

*Attorneys for Defendants*